

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

In re	§	Chapter 11
	§	
SPHERATURE INVESTMENTS LLC, <i>et al.</i> , ¹	§	Case No. 20-42492
	§	
Debtors.	§	Jointly Administered
	§	

SPHERATURE INVESTMENTS, LLC, <i>et al.</i> d/b/a WORLDVENTURES HOLDINGS, LLC,	§	Adversary No. 21-04059
	§	
	§	
Plaintiffs	§	
	§	
vs.	§	
	§	
SEACRET DIRECT LLC,	§	
	§	
Defendant.	§	

EXPEDITED MOTION FOR CONTINUANCE

**TO THE HONORABLE BRENDA T. RHOADES, CHIEF UNITED STATES
BANKRUPTCY JUDGE:**

Seacret Direct LLC ("Seacret"), the Defendant in the above-captioned adversary proceeding, files this *Expedited Motion for Continuance* (the "Continuance Motion"), seeking to continue the hearing on *Seacret Direct LLC's Motion to Compel Arbitration, Motion to Dismiss, and Motion for More Definite Statement* [Docket No. 4] (the "Arbitration Motion"), currently set

¹ The "Debtors" and the "Plaintiffs" in the above-captioned cases are: Spherature Investments LLC ("Spherature"), EIN #5471; Rovia, LLC ("Rovia"), EIN #7705; WorldVentures Marketing Holdings, LLC ("WV Marketing Holdings"), EIN #3846; WorldVentures Marketplace, LLC ("WV Marketplace"), EIN #6264; WorldVentures Marketing, LLC ("WVMarketing"), EIN #3255; and WorldVentures Services, LLC ("WV Services"), EIN #2220.

for **May 11, 2021, at 2:30 P.M. (CST)** (the "Hearing"), and would respectfully state as follows in support thereof:

I. Relief Requested

1. On December 21, 2020, the Plaintiffs filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code.

2. On March 5, 2021, the Plaintiffs filed their *Original Complaint and Request for Preliminary Injunction* [Docket No. 1] (the "Complaint") in the above-captioned adversary proceeding.

3. On March 31, 2021, Seacret responded to the Complaint by filing the Arbitration Motion.

4. On April 14, 2021, the Plaintiffs filed their *Amended Complaint and Request for Preliminary Injunction* [Docket No. 6] (the "Amended Complaint") in the above-captioned adversary proceeding.

5. Pursuant to F.R.C.P. 15(a)(3), Seacret has 14 days to respond to the Amended Complaint, and Seacret does intend to file another Rule 12 motion in that time frame. Pursuant to Local Bankruptcy Rules 7007-1 and 9014-1(b), the Plaintiffs would then have 14 days to object if they oppose such relief. In total, the end of the 28 days for supplemental pleadings as provided by the Rules would be May 12, 2021.

6. On April 14, 2021, the Plaintiffs also filed their *Response to the Motion to Compel Arbitration, Motion to Dismiss, and Motion for More Definite Statement* [Docket No. 7] (the "Response"), responding to the Arbitration Motion.

7. On April 16, 2021, Seacret sent requests for production and requests for admission to the Plaintiffs requesting discovery in connection with factual issues raised in the Response.

Under F.R.C.P. 34 and 36, responses are due May 16, 2021. Seacret has also sent subpoenas for third party discovery.

8. On April 17, 2021, the Court set the Arbitration Motion for hearing on **May 11, 2021, at 2:30 P.M. (CST)**.

II. Grounds for Relief

9. Seacret believes it is necessary to conduct limited discovery related to the Arbitration Motion. To date, Seacret has sought discovery from the Plaintiffs and a third party (Wayne Nugent). The latest response date for this discovery is May 16.

10. Seacret also intends to file a response to the Amended Complaint. The total time provided by the Rules for such response and objection would expire May 12, which is the day after the current hearing date.

11. In order to allow sufficient time for the parties to engage in discovery and file supplemental pleadings, Seacret respectfully requests that this Court continue the Hearing until at least May 20, 2021.

12. The undersigned counsel has conferred with counsel for the Plaintiffs. The Plaintiffs do not oppose the continuance requested by this Continuance Motion.

III. Prayer

Accordingly, Seacret respectfully requests that this Court (i) grant the Continuance Motion; (ii) set the Arbitration Motion for hearing on or after May 20, 2021; and (iii) grant to Seacret all such other and further relief to which it may fairly and equitably be entitled, both at law and in equity.

DATED: April 21, 2021.

Respectfully submitted,

By: /s/ Phillip L. Lamberson

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**ATTORNEYS FOR
SEACRET DIRECT LLC**

CERTIFICATE OF SERVICE

I hereby certify that on April 21, 2021, notice of this document was electronically mailed to the parties registered or otherwise entitled to receive electronic notices in this case pursuant to the Electronic Filing Procedures in this District.

/s/ Phillip L. Lamberson

One of Counsel